



Bristol Tree Forum - Statement to Planning Committee B (20 May 2026)

Application 25/14849/M | Land at Broom Hill / Brislington Meadows, Broomhill Road, Bristol BS4 4UD

!0% Biodiversity Net Gain has not been achieved

The latest Statutory Metric Calculation (SMC), published on 11 May 2026, shows that this Reserved Matters proposal now produces a **net loss** of biodiversity for area habitats – falling from +17.54% to **-3.78%**, a deficit of 7.59 area Habitat Units (HUs). The trading rules also now show the following area habitat shortfalls, which must be made good as part of the BNG rules:

- Grassland: **-5.18 HUs**
- Heathland and shrub: **-7.60 HUs**
- Woodland and forest: **-1.04 HUs**

These figures incorporate the proposed off-site improvements. The applicant has committed to achieving at least 10% BNG, yet the evidence demonstrates that this commitment has not been fulfilled.

Condition 25 has not been discharged

Condition 25 of the Outline Consent approval requires that, *prior to or concurrent with* the first Reserved Matters submission, a BNG Strategy must be *submitted to and approved in writing by the Local Planning Authority*. That strategy must demonstrate how the 10% BNG uplift will be achieved across both on-site and off-site habitats. This has not been satisfied.

The Planning Officer's report is inconsistent

The Officer acknowledges that the BNG strategy must be discharged before the Reserved Matters application is issued, yet simultaneously asserts that failure to discharge it would *not prevent the committee from agreeing the recommendation for approval*. These positions are irreconcilable. Furthermore, the Officer's claim that 'the achievement of a 10% uplift in BNG is secured' cannot stand when:

- the applicant's own metric calculation demonstrates a net area-habitat loss
- the on-site *Individual trees* habitat has been omitted from the baseline calculation – a serious error that further undermines the BNG case.

Recommendation

Approval of this application and the parallel application 25/14850/COND would result in a net loss of biodiversity in direct conflict with the applicant's own commitments and the requirements of Condition 25.

BTF therefore urges the Committee to **refuse this application**.

Full BTF comments (14 May 2026): <https://bristoltreeforum.org/wp-content/uploads/2026/05/btf-4th-comments-e28093-14-may-2026.pdf>

15 May 2025